



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: WAYNE KAIFLER
MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 05/10/10, AGAINST MOS KAIFLER:
ALLEGATION 1: DEPARTMENT RULE/VIOLATION (FAIL TO USE DEPT TOW).
ALLEGATION 2: MEMOBOOK INCOMPLETE.
ACTION TAKEN: 'B' CD ISSUED.
CASE STATUS: CLOSED ON 08/08/12.

Disclosure # 2:

DET. KAIFLER PROVIDED TESTIMONY [REDACTED]
[REDACTED]
PRESIDED OVER BY JUDGE DEBORAH STEVENS MODICA. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] THE JUDGE'S RULING FOUND INCREDIBLE DET. KAIFLER'S TESTIMONY THAT [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IN ADDITION, BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS.

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